

REMARKS

The Office Action follows the RCE filed on November 8, 2005. Claims 12-21 have again been examined, and claims 23-28 and 30-34 are still withdrawn from examination.

The rejections are nearly identical to those set forth in the previous (final) Office Action, except that the Examiner now relies on an additional (previously cited, but unapplied) reference, Gasowski (U.S. Patent No. 4,922,985) as "...further evidence [of] the known use of a carcass turnup or wrap part having a contour that closely mimics that of the bead core." First full paragraph on page 4 of the Office Action. According to the Examiner, Gasowski is additional evidence that the claimed "plastic deformation region" would have been obvious. Specifically, the Examiner argues that the "plastic deformation region" is defined as being a "formed zone of rectangle, curve, or the like adaptable to a radially sectional profile shape of the bead core" - see the paragraph bridging pages 5 and 6 of the specification.

The Examiner specifically responds to Applicants' arguments and the amendment to claim 12 in Section 5 of the Office Action beginning on page 7. The Examiner again maintains that rubber layer 12 in Continental (FR '358/UK '050) is comparable to the rubber layer in claim 12. Moreover, at the top of page 8 of the Office Action, the Examiner states that "...a bead filler represents a fundamental component of pneumatic tires and one of ordinary skill in the art at the time of the invention would have expected such a component to be in the tire of Continental, though not expressly depicted as a distinct component" (emphasis ours).

Applicants respectfully submit that the above underlined statement by the Examiner is incorrect and unsupported. Continental fails to teach or suggest a bead filler. In fact, the cross-hatching in Fig. 3 of the reference clearly shows that a bead filler is not present. In the middle paragraph on page 8 of the Office Action, the Examiner continues by asserting that "...reference character [15] does not incorporate the bead filler, which is positioned axially inward of the above noted turn up ends." However, as stated above, there is no bead filler in Continental's tire. Also, the Examiner provides no support for his conclusion that the alleged "bead filler" would be located "axially inward" of the turn-up ends.

Thus, Applicants respectfully submit that the Examiner is speculating and postulating how the tire in Continental might have been modified to arrive at the claimed invention, but the only teaching he can cite to for the combination of features in claim 12 is the application itself. This, of course, is not permitted and is a classic case of hindsight. As an example, since there is no bead filler, the Examiner also has to speculate as to the relative hardness values of the bead filler (if there were one), the layer 12 and the reinforcing layer 9.

As to the "plastic deformation region...formed in the wrap part" as recited in claim 12, Applicants respectfully submit that the Examiner is applying an overly broad definition of this term (see the definition quoted above), and ignoring the plain meaning of the claim language, namely, that the region is capable of plastic deformation. As explained in the specification, this region allows the wrap part to conform, adapt or follow the shape of the bead core. As explained in the previous response, none of the cited art (including JP '905 mentioned by the Examiner in

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the paragraph bridging pages 8 and 9 of the Office Action) teaches or fairly suggests such a feature.

In any event, claim 12 is hereby amended to more clearly define the invention, i.e., to recite that the “outer end of the wrap part is terminated on the bead core.”

Gasowski ‘985 discloses that the turnup portion of the carcass ply is rounded about the bead core and extended upward along the main portion, which is different from the termination position of the wrap part of the carcass ply defined in the present invention. Further, Gasowski ‘985 clearly fails to teach or suggest a rubber layer reinforcing layer.

JP ‘905 discloses that the tire fabric is used as a carcass ply. Such a tire fabric will never form a plastic deformation region.

In view of the preceding amendments and remarks, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue that the Examiner feels may be best resolved through a personal or telephonic interview, he is kindly requested to contact the undersigned attorney at the local telephone number listed below.

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Respectfully submitted,



Steven M. Gruskin
Registration No. 36,818

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

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